

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

ZAVODCHIKOV, et al.,

Defendants.

CA No. 16-cv-00845 (MCA-LDW)

**DECLARATION OF JOHN
DONNELLY REGARDING SERVICE
BY PUBLICATION**

I, John Donnelly, declare as follows:

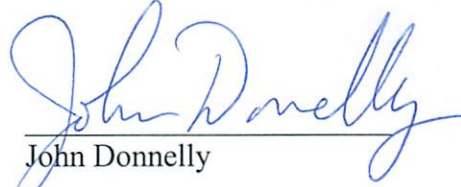
1. I am counsel for plaintiff Securities and Exchange Commission (the “Commission”) in this action. I make this Declaration regarding service on Defendants Evgenii Zavodchikov, Andrey Bokarev, Radion Panko, Natalia Andreevna Alepko, and Anton Maslov via publication pursuant to the Court’s Memorandum Opinion and Order granting plaintiff’s motion for alternative service and to issue a corrected summons, dated August 30, 2017, docket number 18 (“Order”).

2. The Order directed Plaintiff, within 45 days of entry of the Order, to publish notice of this case in the New York Times International Edition one day per week for four consecutive weeks. Plaintiff has served defendants in accordance with the Order.

3. A true and correct copy of the notice of this action which was published in the New York Times International Edition is attached hereto as Exhibit 1. This notice was published on the following dates: September 20, 2017; September 27, 2017; October 4, 2017; and October 11, 2017. True and correct copies of the pages on which the notice ran on those dates are attached hereto as Exhibits 2, 3, 4, and 5 respectively.

4. To date, none of the defendants has appeared in this action or contacted counsel for the Commission.

I declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.


John Donnelly

Dated: October 30, 2017